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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PARADISE ENTERTAINMENT LIMITED, a
Bermuda corporation; LT GAME, INC., a
Nevada corporation; and LT GAME LIMITED, a
British Virgin Islands corporation

Plaintiffs/Counterdefendants,

v.

EMPIRE TECHNOLOGICAL GROUP
LIMITED, a Nevada corporation; GAMING
SPECIALIZED LOGISTICS LLC, a Nevada
limited liability company; LINYI FENG, an
individual; ROY KELCEY ALLISON, an
individual; DARYN KIELY, an individual; and
YI ZHAO, an individual,

Defendants/Counterclaimants.

Case No. 2:24-cv-00428-JCM-BNW

**JOINT STIPULATION TO EXTEND CASE
DEADLINES**

[THIRD REQUEST]

STIPULATION

Case No. 2:24-cv-00428-JCM-BNW

1 Plaintiffs Paradise Entertainment Limited (“**Paradise**”), LT Game, Inc. (“**LT Game**”), and LT
2 Game Limited (“**LTG Limited**”) (collectively “**Plaintiffs**”) and Defendants Empire Technological Group
3 Limited (“**Empire**”), Linyi (Frank) Feng, Roy Kelcey Allison, Gaming Specialized Logistics LLC
4 (“**GSL**”), and Daryn Kiely (collectively, “**Defendants**”) by and through their undersigned counsel of
5 record, hereby stipulate and agree to a three month extension of the case deadlines for multiple
6 independent reasons: (1) to allow the Court to resolve the pending Motion to Dismiss filed by Defendant
7 Yi “Betty” Zhao, (2) to allow the Court to resolve Plaintiffs’ pending Motion to Compel various
8 correspondence Defendants had with the law firm Lewis Roca and related records, (3) to allow completion
9 of substantial additional document productions that remain pending from both Parties and from several
10 non-parties, (4) to allow for the completion of the final round of depositions after such document
11 productions are received, and (5) to allow for the opportunity for the Parties to engage in an additional
12 private meditation session following completion of additional fact discovery.

13 The Parties are making their request well in advance of the current August 29, 2025, fact discovery
14 deadline, and submit that there is good cause for the schedule extension, as discussed below.

15 **A. Background**

16 Since Plaintiffs filed their Complaint on March 1, 2024, this has become a far-reaching case
17 involving a large number of witnesses, cross-border discovery, and substantial non-party discovery. The
18 Parties have already conducted significant written discovery, and produced tens of thousands of
19 documents. The fact that the dispute spans a period of time of seven years and involves international
20 companies has resulted in each side reviewing and producing records from document collections that have
21 turned out to be terabytes in size, with document production involving the collection and review of a large
22 volume of Chinese-language documents. The parties have also already conducted 10 depositions as of the
23 date of this stipulation, including two in Hong Kong, and anticipate at least a dozen more depositions
24 occurring as well, including of the primary party witnesses and important non-party witnesses whose
25 document productions have not yet been made. This includes non-parties California Commerce Club, Inc.
26 (“Commerce Casino”) and its CEO, Jeffrey Harris, who are the defendants in a co-pending Miscellaneous
27 Case Plaintiffs recently filed in the Central District of California seeking to compel compliance with
28 document subpoenas issued to those non-parties in the present case.

1 The Parties further note that they conducted a first private mediation in April and expect to engage
2 in a second session following completion of further fact discovery.

3 **B. The Parties' Scheduling Proposal For Addressing Defendant Zhao's Pending**
4 **Motion To Dismiss**

5 The present procedural posture regarding Ms. Zhao has created a scheduling problem. The Parties'
6 understanding is that the Motion to Dismiss might not be resolved until well after the current August 29
7 close of fact discovery, presenting a dilemma with how to involve Ms. Zhao in discovery. In view of this,
8 both Parties agree that a schedule extension is appropriate to allow more time not only for the Motion to
9 Dismiss to be resolved but also for discovery to be conducted relative to Ms. Zhao if she remains in the
10 case.

11 **C. Other Pending Discovery Matters Supporting A Schedule Extension**

12 The Parties respectfully request a schedule extension to allow for the completion of several
13 important categories of discovery:

- 14 • *Resolution of C.D. Cal. Miscellaneous Action No. 2:25-mc-00054, Paradise*
15 *Entertainment Limited et al. v. California Commerce Club, Inc., et al.*: [Comments in
16 this section are provided by Plaintiffs only] As alleged in their Complaint, Plaintiffs
17 contend that California Commerce Club (dba Commerce Casino) and its CEO Jeff Harris
18 ("Commerce Defendants") are key figures in this case and that Mr. Harris has been closely
19 involved in Defendants' conduct for several years as an advisor and financial backer.
20 Plaintiffs served subpoenas on the Commerce Defendants several months ago, and
21 keyword searches related to this case in their email records revealed thousands of hits.
22 Plaintiffs diligently negotiated with the Commerce Defendants regarding a potential
23 document production that would have comprised records exclusively in the Commerce
24 Defendants' possession (as opposed to communications otherwise in Defendants'
25 possession), but the Commerce Defendants ultimately refused to make any production.
26 Plaintiffs therefore filed a Miscellaneous Action in the Central District of California (where
27 Commerce Casino and Mr. Harris are located) on June 18, 2025 in order to compel
28 responses. After initially setting a hearing for July 18, the California court pushed back the

1 hearing to August 5, creating a risk that the Commerce Defendants would not produce
2 documents until after the August 29 fact discovery deadline in this case, and/or that the
3 Parties would not have sufficient time to review such documents or meaningfully use them
4 in depositions.

- 5 • ***Completion of Plaintiffs' Supplemental Production:*** Based on meet and confers with
6 Defendants, and to avoid burdening the Court with more discovery motion practice,
7 Plaintiffs agreed to make a supplemental round of document productions. However, these
8 have taken longer than anticipated, in part because of the need to hire vendors in China to
9 perform the collections, and the difficulty of translating what are mostly Chinese-language
10 records to English. Further, Defendants recently deposed two of Plaintiffs' employees and
11 requested additional categories of documents referenced at those depositions, which
12 Plaintiffs recently agreed to search for and produce, as appropriate. The Parties seek
13 additional time to collect, produce, receive, and review these forthcoming document
14 productions so that they can be utilized in deposing Plaintiffs' primary witnesses.
- 15 • ***Resolution of Motion to Compel Lewis Roca Records:*** [Comments in this section are
16 provided by Plaintiffs only] Still pending before the Court is Plaintiffs' Motion to Compel
17 various correspondence Defendants had with the law firm Lewis Roca and related records.
18 Plaintiffs filed their Motion on June 5, 2025 (ECF No. 87), Defendants filed their Response
19 on June 20, 2025 (ECF No. 90), and Plaintiffs filed their Reply on June 27, 2025 (ECF No.
20 98). Plaintiffs are uncertain of when the Motion may ultimately be resolved. The Court
21 initially set a hearing date of July 7 (ECF No. 91), but the Parties requested a continuance
22 of the hearing to the week of July 14 in view of Defendants' schedule conflicts (ECF No.
23 97). The Court granted the continuance, but indicated that the hearing will need to occur in
24 August (ECF No. 99). Because a large volume of documents are at issue, even if the Court
25 were to grant Plaintiffs' Motion, there is a risk that those documents could not be produced
26 by August 29, much less reviewed in advance of depositions.
- 27 • ***Completion of Defendants' Supplemental Production:*** To avoid further discovery motion
28 practice, Defendants agreed to make a supplemental production of documents related to

communications with Commerce Casino and its CEO Jeff Harris. Defendants require additional time to review and produce these records. Plaintiffs seek additional time to receive and review these forthcoming document productions so that they can be utilized in the upcoming depositions.

- ***Discovery from Non-Parties:*** In early June, Plaintiffs served subpoenas to obtain documents and testimony from non-party witnesses, including two former employees of Defendant Empire. Those non-parties are now represented by Defendants' counsel; and they require additional time to collect, process, and produce responsive records, and to prepare for their depositions. Plaintiffs seek additional time to receive and review these forthcoming document productions so that they can be utilized in the upcoming depositions.
- ***Additional Depositions, Including Primary Witness Depositions:*** Although the Parties have already deposed a large number of witnesses, the depositions of the primary party witnesses still need to occur, including Plaintiffs' witnesses who will need to obtain visas to fly in from China. The Parties collectively anticipate deposing at least seven primary party witnesses. Many of these depositions are expected to span multiple days, as several of the primary party witnesses are likely to also be deposed under Rule 30(b)(6). Of note, the Parties are also actively negotiating corporate representative topics and need additional time to finalize those topics before depositions occur. The Parties are also actively considering noticing several other depositions of current and former employees of Plaintiffs and Defendants. For these depositions to have maximum value, the Parties seek an extension of the case schedule in order to allow the balance of the discovery described above to be completed ahead of those depositions.

D. Statement Specifying the Discovery Completed and What Remains

The Parties have diligently conducted expansive discovery to-date, which has included:

- Collection and review of hundreds of thousands documents, including a large volume of Chinese-language documents;
- Production of tens of thousands of documents— amounting to many terabytes of data;

- Documents produced following the Parties' first mediation session in April;
- 10 depositions of current and former employees of Plaintiffs and Defendants, including two depositions of Plaintiff employees in Hong Kong;
- Over 30 subpoenas served to non-party witnesses seeking documents and depositions;
- Defendants' production of lengthy privilege logs;
- A second round of document production that has been underway from Plaintiffs involving thousands of Chinese-language documents collected after engaging an overseas vendor;
- Initial meet and confer on Rule 30(b)(6) deposition topics;
- A cumulative total of 108 Interrogatories served among the Parties;
- A cumulative total of 238 Requests for Production served among the Parties; and
- Numerous meet and confers.

Fact discovery has pertained to a period of time spanning almost a decade, and touches upon almost all aspects of the Parties' United States business operations, as well as certain overseas operations. This has resulted in each side reviewing and producing records from document collections that have turned out to be terabytes in size, which is beyond what the parties originally expected at the start of the case. The Parties have exchanged numerous discovery deficiency letters and engaged in repeated meet and confer sessions and other correspondence over the past several months. The Parties have been working diligently to try to resolve their discovery disputes by good faith negotiation rather than motion practice.

In sum, discovery still to be completed includes:

- Resolution of Ms. Zhao's Motion to Dismiss and, if applicable, subsequent discovery from Ms. Zhao;
- Resolution of Plaintiffs' C.D. Cal. Miscellaneous Case No. 2:25-mc-00054 against Commerce Casino and Mr. Harris;
- Completion of Plaintiffs' supplemental round of document production involving thousands of new records collected in China;
- Completion of Defendants' supplemental round of document production involving records relating to Commerce Casino and Mr. Harris;
- Resolution of Plaintiffs' Motion to Compel Lewis Roca records;

- Completion of document collection from at least three non-party witnesses;
- Taking of at least a dozen more depositions, including both primary party witnesses, and important non-parties, and involving coordination with overseas witnesses; and
- Further conferences to resolve any open discovery issues.

E. The Parties' Requested Extension

For the reasons discussed above, the Parties respectfully request a three month extension of the case schedule. This Parties have been diligently engaged in discovery to-date, and submit that good cause exists supporting the request so as to allow sufficient time for the orderly completion of discovery, to resolve a complex discovery dispute, and to potentially engage in a second private mediation session.

The proposed updated case schedule is shown below.

Event	Current Deadlines	Parties' Proposal
Close of Fact Discovery	August 29, 2025	December 5, 2025
Last day to serve initial expert reports on topics on which the party bears the burden of proof and materials relied upon by experts	September 30, 2025	January 9, 2025
Last day to serve rebuttal experts on topics on which the party does not bear the burden of proof and materials relied upon by rebuttal experts	October 27, 2025	February 6, 2026
Close of Expert Discovery (including expert depositions)	November 21, 2025	March 6, 2026
Deadline to file dispositive motions	December 19, 2025	March 27, 2026
Deadline to file opposition to dispositive motions	January 23, 2026	April 17, 2026
Deadline to file replies to dispositive motions	February 6, 2026	April 24, 2026
Deadline to file Rule 702 (<i>Daubert</i>) motions	March 6, 2026	May 15, 2026
Deadline to file opposition to Rule 702 (<i>Daubert</i>) motions	March 27, 2026	May 29, 2026
Deadline to file replies to Rule 702 (<i>Daubert</i>) motions	April 3, 2026	June 5, 2026
Deadline to file Pretrial Order if no dispositive motions are filed	January 23, 2026	April 17, 2026

IT IS SO STIPULATED.

Dated this 14th day of July, 2025.

/s/ Jessica M. Lujan

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Dated this 14th day of July, 2025.

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ORDER

The Court, having reviewed the above stipulation of the parties, and good cause appearing therefor, hereby **GRANTS** the above stipulation, **ADOPTS** the proposed discovery deadlines as set forth herein.

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: July 15, 2025